Closure Plan for Drum Storage Area
Site S-74
EPA I.D. No. OHD 004220810
United States Steel Corporation's
Cuyahoga Plant
Cuyahoga Heights, Ohio

General Facility Description

United States Steel Corporation (USSC) has operated a hazardous waste drum storage area, designated as Site S-74, within the Cuyahoga Plant boundaries from October 1980 to the present. USSC is permitted under interim status regulations, Hazardous Waste Permit No. 02-18-0091, to operate Site S-74 and other hazardous waste facilities within the Cuyahoga Plant. Site S-74 is used for the temporary storage of hazardous waste awaiting shipment for off-site disposal. Only wastes generated within the plant are sent to Site S-74.

Site S-74 consists of a 1,250-square foot area completely surrounded by a fence. Sealed 55-gallon drums are stored upright in a single layer on bare ground within the fenced area. The design capacity of this facility is fifty 55-gallon drums.

Waste Characterization

Containerized leaded steel dust (EPA waste code D008) and on occasion, drums of spent pickle liquor contaminated soils (EPA Waste Code K062) are the only hazardous materials stored within this site. Leaded steel dust is a finely divided powder resulting from steel grinder operations. Spent pickle liquor contaminated soils result from infrequent accidental spills of pickle liquor on the ground.

Maximum Waste Inventory

At any time during the life of the facility, the maximum inventory of waste in storage would be fifty 55-gallon drums based on the physical size of the site.

Normal Operating Procedures

Leaded steel dust, when generated, is loaded into DOT-approved drums at the source of generation and the drums are sealed prior to transporting to Site S-74. Sealed drums are temporarily stored in Site S-74 prior to shipment offsite for disposal. Soils, contaminated by spent pickle liquor are excavated and loaded into 55-gallon drums and transferred to Site S-74 and stored until arrangements for offsite disposal can be made.

Removal of Waste Inventory

At closure, all drums in Site S-74 would be transported offsite for disposal at a secure landfill. Because the waste managed is a hazardous material, hazardous waste manifests would be completed and retained in plant correspondence files as required. The manifest(s) together with the associated certificate of disposal would comprise the documentation necessary to demonstrate that the waste material has been properly disposed.

Procedures for Facility Decontamination

Because leaded steel dust and pickle liquor contaminated soil are brought to Site S-74 in sealed drums and because hazardous waste releases are routinely contained and corrective action implemented in accordance with Cuyahoga Plant's "Contingency Plan for Emergencies Involving Hazardous Waste Materials," it is unlikely that facility decontamination procedures other than removal of all drums would be required.

Once the inventory of drums has been removed, an independent registered professional engineer will conduct an onsite inspection of S-74, will examine all waste manifests and other available documentation of the operating record of S-74, and will interview plant personnel responsible for maintaining/operating S-74. The Engineers' responsi-

bility will include certifying that all wastes, including spilled materials have been removed and properly disposed. If in the opinion of this professional engineer there is evidence of site contamination, an investigation of the suspected area would be undertaken to determine the extent of contamination. Based on the subsequent findings, appropriate remedial measures would be implemented.

Closure Certification

During closure activities, an independent registered professional engineer will inspect Site S-74 as necessary to ensure that closure is in accordance with the approved closure plan. Certificates attesting to the proper closure of Site S-74 will be submitted to the Ohio EPA and USEPA by both the independent professional engineer and the appropriate USSC authority.